Supporting Statement for the Foreign Branch Report of Condition (FFIEC 030 and FFIEC 030S; OMB No. 7100-0071)

1. Explain the circumstances that make the collection of information necessary.

The Board of Governors of the Federal Reserve System (Board) requests approval from the Office of Management and Budget (OMB) to extend for three years, without revision, the Federal Financial Institutions Examination Council (FFIEC) Foreign Branch Report of Condition (FFIEC 030 and FFIEC 030S; OMB No. 7100-0071). Insured domestically chartered commercial banks and savings associations (U.S. banks) that have one or more branch offices in a foreign country are required to report balance sheet information for each of their foreign branches on either the FFIEC 030 or FFIEC 030S. The FFIEC 030 is collected annually as of December 31 or quarterly for significant branches as of the last day of each calendar quarter; the FFIEC 030S is an abbreviated reporting form filed annually by smaller institutions.

The Federal Reserve receives reports for all foreign branches of U.S. banks, regardless of charter type, on behalf of the U.S. banks' primary federal bank regulatory agency (Board, Federal Deposit Insurance Corporation (FDIC), or Office of the Comptroller of the Currency (OCC) (collectively, the agencies)). The agencies use the FFIEC 030 and FFIEC 030S reports to fulfill their statutory obligation to supervise foreign operations of domestic banks. Each of the agencies separately clears the reports pursuant to the Paperwork Reduction Act, including with regard to estimating respondent burden, for U.S. banks under their supervision. The FDIC and OCC have also submitted similar requests for OMB review for U.S. banks under their supervision.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The FFIEC 030 and FFIEC 030S collect information on the structure and geographic distribution of foreign branch assets and liabilities. The agencies use this information to plan examinations and to analyze the foreign operations of U.S. banks, in connection with the agencies' statutory responsibility to assess the safety and soundness of the U.S. banks that they supervise. The information collected by the FFIEC 030 and FFIEC 030S allows the agencies to measure growth trends by bank, by country, and by bank within country. Additionally, aggregate data that is publicly released by the agencies are a useful source of information on U.S. bank activities for the general public. This series of data collected by these reports is the oldest statistical series that exists for foreign branches of U.S. banks and is an important source for measuring the growth of these offices.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Reporting branches that wish to submit the FFIEC 030 or the FFIEC 030S report electronically using the Federal Reserve's Reporting Central application should contact their Reporting and Reserves District Contact (https://<u>www.frbservices.org/contacts/index.jsp#RR</u>) for instructions. If the FFIEC 030 or FFIEC 030S report is filed electronically, the completed and signed original report need not be filed with the appropriate Federal Reserve District Bank. However, the parent U.S. institution must maintain the completed and signed original report in its files.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The FFIEC 030 is the only report through which the agencies collect balance sheet information on foreign branches of U.S. banks. The Board uses another report, the Quarterly Report of Assets and Liabilities of Large Foreign Offices of U.S. Banks (FR 2502q; OMB No. 7100-0079), to collect less detailed balance sheet information from parent institutions of foreign branches or subsidiaries (specifically, those with total assets of \$500 million or more). The FR 2502q collects only gross assets and liabilities by the country of the principal address of the customer, rather than the type of assets and liabilities of the branch. Although the FR 2502q does not provide comparable information, the Board may check the FFIEC 030 to verify that individual branches that report total assets greater than or equal to \$500 million also report on the FR 2502q.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Of these respondents, 6 for the FFIEC 030 Annual; 1 for the FFIEC 030 Quarterly; and 7 for the FFIEC 030S are considered small entities as defined by the Small Business Administration (i.e., entities with less than \$600 million in total assets), https://www.sba.gov/document/support--table-size-standards.

The FFIEC 030S is an abbreviated reporting form containing five data items that U.S. banks must file with regard to foreign branches with total assets between \$50 million and \$250 million file annually. These data items are the minimum information needed to serve as indicators of higher business volume, risk, and complexity in small-sized foreign branches. The reported information also is used to monitor potential developments that may pose risks to the overall operations of the parent bank. U.S. banks do not have to file an FFIEC 030 or 030S with respect to any foreign branch with total assets of less than \$50 million and that do not otherwise meet the requirements to file the FFIEC 030 quarterly.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If this collection were conducted less frequently than the present annual collection, the agencies would have insufficient information regarding U.S. bank activity in the Eurocurrency

markets and at specific foreign locations on which to base informed policy decisions, reports to Congress, and foreign branch examinations. Quarterly reporting by the largest foreign branches permits agencies to monitor foreign currency markets in a timely manner while minimizing burden on the respondents as a whole.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d)(2).

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. Describe comments in response to the *Federal Register* notice and efforts to consult outside the agency.

On August 13, 2021, the agencies, under the auspices of the FFIEC, published an initial notice in the *Federal Register* (86 FR 44768) requesting public comment for 60 days on the extension, without revision, of the FFIEC 030 and FFIEC 030S. The comment period for this notice expired on October 12, 2021. The agencies received one comment from a financial institution. The commenter asked the agencies to clarify how to report equity securities with readily determinable fair values not held for trading in the FFIEC 030. The commenter stated that reporting these securities in line 4(b), "Other securities (debt and equity)" would align the FFIEC 030 with the Call Report classification. The agencies agree with the commenter's suggestions and will clarify the FFIEC 030 instructions accordingly. On November 10, 2021, the agencies, under the auspices of the FFIEC, published a final notice in the *Federal Register* (86 FR 62599) requesting public comment for 30 days on the extension, without revision, of the FFIEC 030 and FFIEC 030S. The comment period for this notice expires on December 10, 2021.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There are no payments or gifts provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

The information that is required to be provided on the FFIEC 030 and FFIEC 030S is collected as part of the Board's supervisory process. Accordingly, such information is afforded confidential treatment under exemption 8 of the Freedom of Information Act (FOIA), which protects information from disclosure that is contained in or related to the examination or supervision of a financial institution (5 U.S.C. § 552(b)(8)). In addition, the FFIEC 030 and FFIEC 030S are likely to contain nonpublic commercial or financial information, which is both customarily and actually treated as private by the respondent. Accordingly, such information may be withheld under exemption 4 of the FOIA (5 U.S.C. § 552(b)(4)). In limited circumstances, aggregate data for multiple respondents, which does not reveal the identity of any individual respondent, may be released to the public.

11. Provide additional justification for any questions of a sensitive nature.

There are no questions of a sensitive nature.

12. Provide estimates of the annual hourly burden of the collection of information.

As shown in the table below, the estimated total annual burden for the FFIEC 030 and FFIEC 030S with respect to banks supervised by the Board is 317 hours. These reporting requirements represent less than 1 percent of the Board's total paperwork burden.

FFIEC 030 and FFIEC 030S	Estimated number of respondents	Annual frequency	Estimated average hours per response	Estimated annual burden hours
FFIEC 030				
Annual	12	1	3.4	41
Quarterly	20	4	3.4	272
FFIEC 030S	7	1	0.5	4
Total				317

The estimated total annual cost to the public for the FFIEC 030 and FFIEC 030S is \$18,751.

Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rates (30% Office & Administrative Support at \$20, 45% Financial Managers at \$73, 15% Lawyers at \$72, and 10% Chief Executives at \$95). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor and Statistics (BLS), *Occupational Employment and Wages May 2020*, published March 31, 2021, <u>https://www.bls.gov/news.release/ocwage.t01.htm</u>. Occupations are defined using the BLS Standard Occupational Classification System, <u>https://www.bls.gov/soc/</u>.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no annualized costs to the respondents.

14. Provide estimates of annualized costs to the Federal government.

The estimated cost to the Federal Reserve System for collecting and processing the FFIEC 030 and FFIEC 030S is \$35,200. The Federal Reserve System collects and processes the data for all three of the agencies.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

There are no program changes or adjustments.

16. Provide information regarding plans for publication of data.

Aggregate data are published in the Federal Reserve Annual Report and the Department of Commerce's Annual Statistical Digest.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

No such approval is sought.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions.